

Mr. Melvin Spaulding  
Consolidated Grain and Barge Company  
P.O. Box 289  
Mount Vernon, IN 47620-0289

Re: **129-14511**  
First Administrative Amendment to  
**Part 70 129-10111-00035**

Dear Mr. Spaulding:

Consolidated Grain and Barge Company was issued a permit on February 20, 2001 for a soybean oil extraction plant. A letter requesting the addition of two soybean storage piles to their existing facility was received on June 19, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
SDF

cc: File - Posey County  
U.S. EPA, Region V  
Posey County Health Department  
Southwest Regional Office  
Air Compliance Section Inspector - Scott Anslinger  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Consolidated Grain and Barge Company  
Bluff Road  
Mount Vernon, Indiana 47620**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No. 129-10111-00035	Date Issued: February 20, 2001
First Administrative Amendment No.: 129-14511-00035	Affected Pages: 11, 38, and 39, with Pages 38a and 39a added
Issued By: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 5, 2001  Expiration Date: September 5, 2006

- (qqq) Two (2) rail loadout systems that operates at a maximum total capacity of 383.3 tons per hour, based on only one system operating at a time, and control PM emissions with one (1) baghouse (C15) that exhausts to Stack 15;
- (rrr) One (1) enclosed conveyor that transfers soybean meal from the lower surge to the barge loadout system at a maximum rate of 383.3 tons;
- (sss) One (1) barge loadout system that operates at a maximum capacity of 383.3 tons per hour and controls PM emissions with one (1) baghouse (C15) that exhausts to Stack 15;
- (ttt) Three (3) 33.7 million (MM)Btu per hour natural gas fired boilers that exhaust to Stacks 17, 18, and 18A;
- (uuu) Two (2) fixed roof hexane storage tanks with a maximum storage capacity of 14,000 gallons each;
- (vvv) One (1) fixed roof hexane work tank with a maximum storage capacity of 8,000 gallons;
- (www) Four (4) fixed roof soybean oil storage tanks with a maximum storage capacity of 932 cubic meters each;
- (xxx) Three (3) fixed roof soybean oil storage day tanks with a maximum storage capacity of 114 cubic meters each;
- (yyy) One (1) fixed roof dust suppression soybean/mineral oil storage tank with a maximum storage capacity of 1,000 gallons; and
- (zzz) Two (2) soybean storage piles, each with a maximum annual throughput of 0.75 million bushels per year.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

### **SECTION D.1 (cont.)**

- (www) Four (4) fixed roof soybean oil storage tanks with a maximum storage capacity of 932 cubic meters each;
- (xxx) Three (3) fixed roof soybean oil storage day tanks with a maximum storage capacity of 114 cubic meters each;
- (yyy) One (1) fixed roof dust suppression soybean/mineral oil storage tank with a maximum storage capacity of 1,000 gallons; and
- (zzz) Two (2) soybean storage piles, each with a maximum annual throughput of 0.75 million bushels per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions).

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]**

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the affected facilities described in this section except when otherwise specified in 40 CFR Part 60, Subpart DD.

#### **D.1.2 New Source Performance Standards(NSPS) Grain Elevators [326 IAC 12] [40 CFR Subpart DD 60.302(b)]**

Pursuant to 40 CFR Subpart DD 60.302(b), process emission gases discharged into the atmosphere from the:

- a. north truck only receiving pit; north house bin loading area elevator and conveyors; north storage/loadout area conveyors;
- b. receiving area P1 truck only receiving pit, belt conveyor system, aspirated receiving leg, drag conveyor and covered belt conveyor;
- c. receiving area P2 hopper bottom truck and rail receiving pits, drag conveyors and aspirated receiving legs;
- d. barge receiving area clamshell crane or bucket unloading, aspirated hopper, belt/mass flow conveyors, conveyor system and bucket elevators;
- e. drag conveyors comprising two conveyance systems between the storage silos and elevator legs; elevator legs; conveyor between the elevator legs and magnet;
- f. cleaning system cleaner, aspirators, hoppers, and scale;
- g. L-Path drag conveyor; drag conveyor to the jet dryers; and
- h. two (2) 0.75 million bushels per year storage piles,

shall not exceed particulate matter (PM) concentrations of 0.01 gr/dscf. Process emission gases from these facilities shall not exhibit greater than 0 percent opacity.

D.1.3 New Source Performance Standards(NSPS) Grain Elevators [326 IAC 12] [40 CFR Subpart DD 60.302(c)]

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- (a) Pursuant to 40 CFR Subpart DD 60.302(c)(1), fugitive emissions from the truck unloading area P1, hopper bottom truck and rail car unloading area P2, north truck unloading area, and two (2) 0.75 million bushels per year soybean storage piles shall not exhibit greater than 5 % opacity.

- (b) Pursuant to 40 CFR Subpart DD 60.302(c)(2), fugitive emissions from the grain handling operations shall not exhibit greater than 0 % opacity 40 CFR Subpart DD 60.302(c).
- (c) Pursuant to 40 CFR Subpart DD 60.302(c)(4), the barge unloading operation shall operate as follows:
  - (1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
  - (2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity.

**D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

The throughput of processed soybeans to the soybean processing facilities shall not exceed 940,240 tons per twelve (12) consecutive month period. This limit is required such that the PTE PM and VOC is less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

**D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2, the PM from the:

Truck Receiving and Conveyors (P1), Rail/Hopper Bed Truck Receiving (P2), North Truck Receiving and Conveyors, Barge Grain Receiving (P16), Annex Silo Loading (P2A), Merchandizing Silo Loading (P26), North House Bin Loading, North House Storage Loadout, Soybean Cleaning (P4), Soybean Heater (P21), Soybean Cracking/Dehulling (P5), Soybean Expander (P23), Soybean Flaking (P19), DTDC Meal Drying (P10 & P11), DTDC Meal Cooling (P12), Meal Sizing (P9), Kaolin Handling (P3), Hull Grinding (P6), Hull Storage Loading (P7), Hull Storage Unloading (P7), Hull Pellet Cooling (P8), Hull Pellet Storage (P8), Meal Storage & Loadout Bins (P20), Truck Meal Loadout (P14), Barge/Rail Meal Loadout (P15), and two (2) 0.75 million bushels per year soybean storage piles

shall not exceed the pound per hour emission rate established as E in one of the following applicable formulas:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

-- or --

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.6 Particulate Matter Emission Rate Limitations**

Pursuant to Consolidated Grain and Barge Company's request, the particulate matter (PM) emission rates shall be limited to the potential controlled emissions as reported below:

Process	PM Emission Rate
Truck Receiving and Conveyors (P1)	0.56 lb/hr
Rail/Hopper Bed Truck Receiving (P2)	0.014 lb/ton bean unloaded

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for an Administrative Amendment to a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	Consolidated Grain and Barge Company
<b>Source Location:</b>	Bluff Road, Mount Vernon, Indiana
<b>County:</b>	Posey
<b>SIC Code:</b>	2057
<b>Operation Permit No.:</b>	T 129-10111-00035
<b>Operation Permit Issuance Date:</b>	February 20, 2001
<b>Exemption No.:</b>	129-14511-00035
<b>Permit Reviewer:</b>	SDF

The Office of Air Quality (OAQ) has reviewed an administrative amendment application from Consolidated Grain and Barge Company relating to the operation of their existing soybean oil extraction plant.

#### **History**

On June 18, 2001, Consolidated Grain and Barge Company submitted an application to add two new tarp enclosed soybean storage piles, each with a maximum design throughput of 0.75 million bushels of soybeans per year, to their existing Title V permit (129-10111-00035, issued on February 20, 2001).

The annual source soybean production is limited to 940,240 tons of soybeans per year under Condition D.1.4 of their existing Title V permit (129-10111-00035, issued on February 20, 2001), to avoid Prevention of Significant Deterioration (PSD) review.

There will not be any increases in PTE from the soybean extraction process because the annual production after the addition of the storage piles will still be less than the above mentioned limited annual production rate.

Therefore, it is determined that the unrestricted potential to emit due to the proposed modification are the particulate matter (PM) and PM10 emissions generated by the storage piles themselves.

#### **Existing Approvals**

The source was issued a Title V Operating Permit (129-10111-00035) on February 20, 2001. This permit is the most updated version of the operating permit.

#### **Enforcement Issue**

There are no enforcement actions pending.



## Recommendation

The staff recommends to the Commissioner that the administrative amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

## Emission Calculations

### UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:

The emissions generated by the proposed modification are the fugitive PM and PM10 emissions generated by the storage piles themselves.

The following calculations determine the unrestricted PM and PM10 potential to emit based on a combined maximum throughput of 1.5 million bu/yr, 60 lb/bu, a PM emission factor of 0.18 lb/ton (AP-42), and a PM10 emission factor of 25% of the filterable PM or 0.059 lb/ton, emissions before controls, and 8760 hours of operation.

PM:  $1.5 \text{ E6 bu/yr} * 60 \text{ lb/bu} * 1/2000 \text{ ton/lb} * 0.18 \text{ lb poll/ton} * 1/2000 \text{ ton/lb} = 4.05 \text{ tons PM/yr}$

PM10:  $1.5 \text{ E6 bu/yr} * 60 \text{ lb/bu} * 1/2000 \text{ ton/lb} * 0.059 \text{ lb poll/ton} * 1/2000 \text{ ton/lb} = 1.33 \text{ tons PM10/yr}$

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4.05
PM-10	1.33
SO <sub>2</sub>	-
VOC	-
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

## Justification for Administrative Amendment

The Title V permit is being modified through an exemption pursuant to 326 IAC 2-1.1-3(d) which states that modifications that have PM or PM10 PTE less than 5 tons per year are exempt. This storage pile approved under an exemption shall be incorporated into the Title V via an administrative amendment under 326 IAC 2-7-11 which states an administrative amendment is an approval that includes modifications that consist of descriptive information where the modification will not trigger a new applicable requirement.

326 IAC 6-3, 326 IAC 6-4, and 40 CFR 60, Subpart DD, the applicable requirements of the proposed modification, already apply to the source.

### County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Posey County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr	Comb. HAPs tons/yr
<b>ton/yr</b>	<b>192.4</b>	<b>161.8</b>	<b>0.3</b>	<b>44.2</b>	<b>206.9</b>	<b>37.2</b>	<b>204.5</b>

- (a) This existing source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This existing source is a Title V major stationary source because the PM10, VOC, and HAPs all exceed their respective Part 70 major source levels.

## Potential to Emit of Source After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

	Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Existing Source PTE	192.4	161.8	0.3	206.9	37.2	44.2	204.5
Modification PTE	4.1	1.3	-	-	-	-	-
Source After Proposed Modification	<b>196.5</b>	<b>163.1</b>	<b>0.3</b>	<b>206.9</b>	<b>37.2</b>	<b>44.2</b>	<b>204.5</b>

Part 70 Major Source Threshold	-	100	100	100	100	100	10 ind. 25 tot.
PSD Threshold Level	250	250	250	100	250	250	-

- (a) This modification to an existing minor PSD stationary source is not major because the emissions after the modification are less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.
- (b) This modification to the existing Title V will not change the status of the stationary source because after the modification, the source will still be a Part 70 major source.

## Federal Rule Applicability

### New Source Performance Standards (NSPS):

The proposed storage piles are subject to 40 CFR 60, Subpart DD, "Standards of Performance for Grain Elevators because the storage piles are determined to be an affected facility (truck unloading station), and are not any of the exemptions listed in 40 CFR 60, Subpart DD, Section 60.304.

A truck unloading station is defined as that portion of a grain elevator where the grain is transferred from a truck, railcar, barge, or ship to a receiving hopper. The soybeans to be unloaded into the proposed storage piles will be by trucks, defining the storage piles as a truck unloading station.

Since Subpart DD already applies, Conditions D.1.2 and D.1.3 shall be amended as follows to include the storage piles.

All deleted language appears as ~~strikeouts~~ and all new language appears in **bold**.

#### D.1.2 New Source Performance Standards(NSPS) Grain Elevators [326 IAC 12] [40 CFR Subpart DD 60.302(b)]

Pursuant to 40 CFR Subpart DD 60.302(b), process emission gases discharged into the atmosphere from the:

- a. north truck only receiving pit; north house bin loading area elevator and conveyors; north storage/loadout area conveyors;

- b. receiving area P1 truck only receiving pit, belt conveyor system, aspirated receiving leg, drag conveyor and covered belt conveyor;
- c. receiving area P2 hopper bottom truck and rail receiving pits, drag conveyors and aspirated receiving legs;
- d. barge receiving area clamshell crane or bucket unloading, aspirated hopper, belt/mass flow conveyors, conveyor system and bucket elevators;
- e. drag conveyors comprising two conveyance systems between the storage silos and elevator legs; elevator legs; conveyor between the elevator legs and magnet;
- f. cleaning system cleaner, aspirators, hoppers, and scale; ~~and~~
- g. L-Path drag conveyor; drag conveyor to the jet dryers; **and**
- h. two (2) 0.75 million bushels per year soybean storage piles,**

shall not exceed particulate matter (PM) concentrations of 0.01 gr/dscf. Process emission gases from these facilities shall not exhibit greater than 0 percent opacity.

D.1.3 New Source Performance Standards(NSPS) Grain Elevators [326 IAC 12] [40 CFR Subpart DD 60.302(c)]

- (a) Pursuant to 40 CFR Subpart DD 60.302(c)(1), fugitive emissions from the truck unloading area P1, hopper bottom truck and rail car unloading area P2, ~~and~~ north truck unloading area, **and two (2) 0.75 million bushels per year soybean storage piles** shall not exhibit greater than 5 % opacity.
- (b) Pursuant to 40 CFR Subpart DD 60.302(c)(2), fugitive emissions from the grain handling operations shall not exhibit greater than 0 % opacity 40 CFR Subpart DD 60.302(c).
- (c) Pursuant to 40 CFR Subpart DD 60.302(c)(4), the barge unloading operation shall operate as follows:
  - (1) The unloading leg shall be enclosed from the top (including the receiving hopper) to the center line of the bottom pulley and ventilation to a control device shall be maintained on both sides of the leg and the grain receiving hopper.
  - (2) The total rate of air ventilated shall be at least 32.1 actual cubic meters per cubic meter of grain handling capacity.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) that are applicable due to the proposed modification.

## State Rule Applicability

### Entire Source:

There are no entire source state rules that become applicable due to this proposed modification because the preventive maintenance plan (326 IAC 1-6-3), emission statement (326 IAC 2-6), opacity limitations (326 IAC 5-1), and fugitive dust limitations (326 IAC 6-4) already apply and the proposed modification does not affect the requirements of these rules.

### Individual Facilities:

Since 326 IAC 6-3-2 already applies to the source, Condition D.1.5 shall be amended as follows to include the proposed storage piles.

All deleted language appears as ~~strikeouts~~ and all new language appears in **bold**.

#### D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the:

Truck Receiving and Conveyors (P1), Rail/Hopper Bed Truck Receiving (P2), North Truck Receiving and Conveyors, Barge Grain Receiving (P16), Annex Silo Loading (P2A), Merchandizing Silo Loading (P26), North House Bin Loading, North House Storage Loadout, Soybean Cleaning (P4), Soybean Heater (P21), Soybean Cracking/Dehulling (P5), Soybean Expander (P23), Soybean Flaking (P19), DTDC Meal Drying (P10 & P11), DTDC Meal Cooling (P12), Meal Sizing (P9), Kaolin Handling (P3), Hull Grinding (P6), Hull Storage Loading (P7), Hull Storage Unloading (P7), Hull Pellet Cooling (P8), Hull Pellet Storage (P8), Meal Storage & Loadout Bins (P20), Truck Meal Loadout (P14), ~~and~~ Barge/Rail Meal Loadout (P15), **and two (2) 0.75 million bushels per year soybean storage piles**

shall not exceed the pound per hour emission rate established as E in one of the following applicable formulas:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

-- or --

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

### Compliance Determination Requirements:

No changes to the compliance determination requirements of the permit (Conditions D.1.9, D.1.10, D.1.11, D.1.12, and D.1.13) are necessary because the respective compliance determination requirements do not apply or already apply to all affected units.

### Compliance Monitoring Requirements:

No changes to the compliance monitoring requirements of the permit (Conditions D.1.14, D.1.15, D.1.16, D.1.17, D.1.18, D.1.19, and D.1.20) are necessary because no new monitoring requirements become applicable as a result of adding the proposed storage piles.

### Recordkeeping and Reporting Requirements:

No changes to the recordkeeping and reporting requirements of the permit (Conditions D.1.21 and D.1.22) are necessary because no new recordkeeping or reporting requirements become applicable as a result of adding the proposed storage piles.

## Other Proposed Changes

The source summary of Condition A.2 and the unit description of Section D.1 shall be amended to include the two proposed storage piles.

All deleted language appears as ~~strikeouts~~ and all new language appears in **bold**.

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) truck only soybean north receiving area (P24) with a maximum throughput capacity of 360 tons per hour consisting of:.....

- (xxx) Three (3) fixed roof soybean oil storage day tanks with a maximum storage capacity of 114 cubic meters each; ~~and~~
- (yyy) One (1) fixed roof dust suppression soybean/mineral oil storage tank with a maximum storage capacity of 1,000 gallons- ; **and**
- (zzz) Two (2) soybean storage piles, each with a maximum annual throughput of 0.75 million bushels per year.**

#### SECTION D.1 FACILITY OPERATION CONDITIONS

##### SECTION D.1 (cont.)

- (www) Four (4) fixed roof soybean oil storage tanks with a maximum storage capacity of 932 cubic meters each;
- (xxx) Three (3) fixed roof soybean oil storage day tanks with a maximum storage capacity of 114 cubic meters each; ~~and~~
- (yyy) One (1) fixed roof dust suppression soybean/mineral oil storage tank with a maximum storage capacity of 1,000 gallons- ; **and**
- (zzz) Two (2) soybean storage piles, each with a maximum annual throughput of 0.75 million bushels per year.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions).

#### Conclusion

The operation of the proposed storage piles shall be subject to the conditions of the attached proposed pages of T129-14511-00035 and all other applicable requirements under the existing Title V permit (T 129-10111-00035, issued on February 20, 2001).